

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO SUBMIT  
OBJECTIONS TO THE PRESENTENCE INVESTIGATION REPORT**

Briondre Martai Odell Hamilton through undersigned counsel, Frances C. Ekwerekwu, respectfully submits this motion requesting an extension of the deadline within which to file objections to the Presentence Investigation Report. He requests until March 30, 2023 to file any objections. In support of this request, counsel states:

1) On October 12, 2022, Mr. Hamilton pled guilty to four counts of Making a False Statement During the Attempted Purchase of a Firearm in violation of 18 U.S.C. § 922(a)(6) (Doc 33).

2) The initial draft of the Presentence Investigation Report was disclosed March 2, 2023 (Doc. 38). The parties must submit any objections, corrections, or requested additions, in writing, by March 16, 2023. *See* FED. R. CRIM. P. 32(f)(1). The Court may change the deadlines prescribed in the rule upon a showing of “good cause.”

FED. R. CRIM. P. 32(b)(2).

3) Counsel is scheduled to appear for the Lawton Indian Country Docket and Lawton Care Court on March 9, 2023. Additionally, Counsel is scheduled for preplanned travel March 10, 2023 through March 17, 2023 and will not have ample time to submit objections to the initial presentence report prior to the March 16, 2023 due date.

4) As counsel currently has one sentencing memorandum and three other PSR objection letters due prior to March 16, 2023, additional time is needed to schedule a time to visit with Mr. Hamilton, research the legal and factual issues related to the initial PSR, as well as request documents and information needed to fully support objections. Undersigned counsel believes that the requested extension should allow sufficient time to accommodate and overcome this obstacle.

5) This request is not made for purposes of delay, but rather to properly prepare objections to the Initial Presentence Report. No other requests for additional time to submit objections has been filed. Mr. Hamilton is in custody in the Pottawatomie County Public Safety Center in Shawnee, Oklahoma. Sentencing has not been set.

6) Danielle Connolly, Assistant United States Attorney, does not oppose this motion.

Based on the preceding, Mr. Hamilton requests the Court enter an order extending the deadline by which to file objections to the Presentence Investigation Report to March 30, 2023.

Respectfully submitted,

s/ Frances C. Ekwerekwu  
FRANCES C. EKWEREKWU  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 7, 2023, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the electronic records currently on file, the Clerk of Court will transmit a Notice of Electronic filing to Danielle Connolly, Assistant United States Attorney.

s/ Frances C. Ekwerekwu  
FRANCES C. EKWEREKWU